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Attorney for Defendants Northwest Trustee Services, Inc.,  
and Routh Crabtree Olsen, P.C.

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

B. CAROL GLOVER,

Case No. 11-cv-00210-HU

Plaintiff,

v.

WACHOVIA EQUITY SERVICING LLC;  
NORTHWEST TRUSTEE SERVICES, INC.;  
WELLS FARGO HOME MORTGAGE; and  
ROUTH CRABTREE OLSEN, P.C.,

**NORTHWEST TRUSTEE SERVICES,  
INC., AND ROUTH CRABTREE OLSEN,  
P.C.'S REQUEST FOR JUDICIAL  
NOTICE IN SUPPORT OF SAID  
DEFENDANTS' MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT (FRCP 12)**

Defendants.

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**TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:**

Defendants Northwest Trustee Services, Inc., and Routh Crabtree Olsen, P.C. (hereinafter "Defendants"), hereby request that the Court take judicial notice of the following documents consisting or documents recorded in the real property records of Yamhill County, and/or are public records and pleading filed within or issued by the United States Bankruptcy Court District

of Oregon, the Yamhill County Circuit, Oregon Court of Appeals, and the Oregon Supreme Court, and attached thereto the Exhibit List filed concurrently herein with this motion and Defendants' Motion to Dismiss Plaintiff's Complaint:

Ex. A- Deed of Trust

Ex. B - Assignment of Deed of Trust

Ex. C - *Glover v. Bank of New York*, 208 Or.App. 545, 147 P.3d 336 (2006)

Ex. D - Complaint B. Carol Glover v. The Bank of New York et al.

Ex. E - OJIN Docket Case No. CV030173

Ex. F - General Judgment Case No. CV030173

Ex. G - Notice of Default and Election to Sell

Ex. H - U.S. Bankruptcy Court Docket Case. No. 08-33163-tmb13

Ex. I - Amended Petition to Set Aside Foreclosure Case No. CV080288

Ex. J - OJIN Docket Case No. CV080288

Ex. K - U.S. Bankruptcy Court Docket Case. No. 08-35558-elp13

Ex. L - Trustee's Deed

Ex. M - U.S. Bankruptcy Court Docket Case. No. 09-30250-tmb3

Ex. N - OJIN Docket Case No. CV090078

Ex. O - Order Granting Plaintiff's Summary Judgment Case No. CV090078

Ex. P - Transcript of Hearing for Summary Judgment Case No. CV090078

Ex. Q - U.S. Bankruptcy Court Docket Case. No. 10-33473-rld13

Ex. R - Transcript of Proceedings Case No. 10-33473-rld13

**BASIS OF REQUEST FOR JUDICIAL NOTICE**

Pursuant to Federal Rule of Evidence 201, the court may take judicial notice of a fact that is not subject to reasonable dispute in that it is either (1) generally known within the territorial jurisdiction of the trial court or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. The court is required to take judicial notice if requested by a party and supplied with the necessary information. FRE 201(d). Judicial notice may also be taken at any stage in the proceeding. FRE 201(f).

The above-referenced documents are all recorded with the Yamhill County Recorder's Office and/or are part the public record having been filed with the federal and state courts in Oregon, and constitute public documents, they are not subject to reasonable dispute, and are capable of accurate and ready determination. Thus, such documents are appropriate for the Court's consideration under a request for judicial notice. Based on the above mentioned, the court may take judicial notice of Exhibits A through R.

DATED this 28th day of March, 2011.

**ROUTH CRABTREE OLSEN, P.C.**

By /s/ Teresa M. Shill  
Teresa M. Shill, OSB #031680  
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**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury under the laws of the State of Oregon that I served the foregoing Request For Judicial Notice to the parties listed below on this 28th day of March, 2011.

**VIA FIRST CLASS MAIL**

B. Carol Glover  
26736 NW Williams Canyon Road  
Gaston, OR 97119  
Plaintiff pro se

**VIA ECF SYSTEM**

John M. Thomas  
Routh Crabtree Olsen, P.C.  
11830 SW Kerr Parkway, Ste. 395  
Lake Oswego, Oregon 97035  
Attorneys for Defendants Wachovia Equity Servicing LLC  
and Wells Fargo Home Mortgage

**ROUTH CRABTREE OLSEN, P.C.**

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